

[Submitting counsel below]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION**

No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF SARAH R. LONDON  
IN SUPPORT OF PLAINTIFF'S  
OPPOSITION TO DEFENDANTS'  
MOTION FOR (1) POSTPONEMENT OF  
FIRST BELLWETHER TRIAL AND  
RELATED RELIEF, AND (2) THIRD-  
PARTY SUBPOENA REGARDING  
MISLEADING AD CAMPAIGN**

This Document Relates to:

*Jaylynn Dean v. Uber Technologies, Inc.,  
et al.*, No. 3:23-cv-06708

Judge: Hon. Charles R. Breyer  
Date: January 6, 2026  
Time: 10:00 a.m.  
Ctrm.: 6 – 17th Floor

1 I, Sarah R. London, declare:

2 1. I am an attorney in the law firm of Girard Sharp LLP, appointed Co-Lead and  
3 Liaison Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of  
4 the State Bar of California and am admitted to practice before this Court. I make this declaration  
5 based on my personal knowledge. If called upon to testify, I could and would testify competently  
6 to the truth of the matters stated herein.

7 2. I submit this declaration in support of Plaintiff's Opposition to Defendants'  
8 Motion for (1) Postponement of First Bellwether Trial and Related Relief, and (2) Third-Party  
9 Subpoena Regarding Misleading Ad Campaign.

10 3. Attached as **Exhibit 1** is a true and correct copy of excerpts from the transcript of  
11 the August 22, 2025 Case Management Conference.

12 4. Attached as **Exhibit 2** is a true and correct copy of the New York Times article  
13 available at: <https://www.nytimes.com/2025/08/06/business/uber-sexual-assault.html>.

14 5. Attached as **Exhibit 3** is a true and correct copy of excerpts from the transcript of  
15 day one of the first bellwether trial in *In re: Uber Rideshare Cases*, No. CJC-21-005188, Cal.  
16 Super. Ct., SF Cnty. (the "JCCP" action), dated September 8, 2025.

17 6. Attached as **Exhibit 4** is a true and correct copy of the webpage available at  
18 <https://www.caoc.org/?pg=history>.

19 7. Attached as **Exhibit 5** is a true and correct copy of Plaintiffs' Certifications in  
20 Response to the Court's Order for October 22, 2025.

21 8. Attached as **Exhibit 6** is a true and correct copy of excerpts from the transcript of  
22 day 16 of the JCCP trial, dated September 30, 2025.

23 9. Attached as **Exhibit 7** is a true and correct copy of excerpts from the transcript of  
24 the December 5, 2025 Case Management Conference.

25 10. Attached as **Exhibit 8** is a true and correct copy of excerpts from the transcript of  
26 the October 31, 2025 Case Management Conference.

27 11. I understand that Consumer Attorneys of California Initiative Defense Political  
28 Action Committee (CAIDPAC) launched an advertising campaign in response to a ballot

1 initiative Uber submitted to the California Secretary of State that would, among other things, limit  
2 the amount automobile accident victims can recover and cap their attorneys' fees.

3 12. My understanding is that the advertising campaign responding to Uber's ballot  
4 initiative was targeted exclusively to California residents and in California media markets.

5 13. The trial in Ms. Dean's case will proceed in Phoenix, Arizona, which is an area  
6 outside the reach of CAOC's California-focused advertising.

7 14. None of the bellwether Plaintiffs are affiliated with CAIDPAC or the Consumer  
8 Attorneys Political Action Committee Executive Board. No attorney on the Plaintiffs' leadership  
9 team of this MDL is on the leadership of CAIDPAC.

10 15. No one on Plaintiffs' MDL leadership team sits on the Consumer Attorneys Political  
11 Action Committee Executive Board, the body that approved, directed, and runs the Every 8 Minutes  
12 campaign.

13 16. The advertising campaign is unrelated to Ms. Dean's case, aside from its reference  
14 to statistics regarding the rate of sexual reports Uber receives. Those statistics were previously  
15 published in a New York Times article and made public during the first JCCP trial.

16 17. On July 23, 2025, just weeks before the JCCP bellwether trial was set to begin,  
17 Uber issued a press release followed by a large-scale marketing and public relations campaign to  
18 launch its "Women Preferences" option in San Francisco. *See*  
19 <https://www.uber.com/newsroom/women-preferences/>. On September 22, 2025, Uber announced  
20 it was expanding this offering to Phoenix. *See*

21 <https://www.tiktok.com/@uber/video/7552979676071775501>.

22  
23 I declare under penalty of perjury that the foregoing is true and correct.

24 Dated: December 29, 2025

25 /s/ Sarah R. London  
26 Sara R. London  
27  
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